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7 Attorney for Ferdinand Richard Balcar, Jr.

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FERDINAND RICHARD BALCAR, JR.,

15 Defendant.

16
17 Case No. 2:96-cr-00046-KJD-PAL

18 **Stipulation to Continue Supplement's**
19 **Deadline to Motion for**
20 **Compassionate Release**
21 **(Third Request)**

22
23 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Freirson, United
24 States Attorney, and Elizabeth White, Assistant United States Attorney, counsel for the United
25 States of America, and Rene L. Valladares, Federal Public Defender, and Heidi Ojeda, Assistant
26 Federal Public Defender, counsel for Ferdinand Richard Balcar, Jr., request that the due date
for Mr. Balcar's Supplement to Motion for Compassionate Release (ECF No. 249), be extended
until January 31, 2023.

27
28 This Stipulation is entered into for the following reasons:

29
30 1. The Court previously granted the parties request for a stipulation to continue
31 the supplement date. Unfortunately, due to a calendar error, counsel did not file

1 by that date. Defendant's family recently reached out about the status of his
2 case. Counsel then realized her mistake and contacted the government.
3 Counsel is in trial starting December 5, 2022 and is taking leave around the
4 holidays. Counsel therefore requests this Court allow defense until January 31,
5 2023 to file a supplement.
6 The parties agree to the continuance.
7 Mr. Balcar does not object to the continuance.
8 The additional time requested by the stipulation is made in good faith and not
9 for purposes of delay.

10 This is the third request for a continuance of the supplement deadline.

11 DATED this 30th of November, 2022.

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13 RENE L. VALLADARES
Federal Public Defender
14

JASON M. FRIERSON
United States Attorney

15 By /s/ Heidi Ojeda
16 HEIDI OJEDA
17 Assistant Federal Public Defender

By /s/ Elizabeth White
ELIZABETH WHITE
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

FERDINAND RICHARD BALCAR, JR.,

Defendant.

Case No. 2:96-cr-00046-KJD-PAL

ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to extend Deadline for filing his Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended until January 31, 2023, and the Government will have until February 14, 2023, to file a response.

DATED this 2nd day of December 2022.

Keith D.

UNITED STATES DISTRICT JUDGE